Effective Title V Permits

Scott Miller
U.S. EPA Region 4
(404) 562-9120
miller.scott@epa.gov

Ideal Title V Permit

- Allows for changes to be undertaken with as little delay and paperwork as possible
- Little effort and foresight can cut time to implementation of operational changes
- Multiple vehicles designed into title V regulations for accommodating changes
- Reduce recordkeeping/reporting

One Tool
Alternative Operating Scenarios

- 40 CFR 70.6(a)(3)(i)(9)
- Permit should include all alternative operating scenarios **REQUESTED BY THE FACILITY** in title V application
- If you can dream it and write it, then install it in the title V permit

Alternative Operating Scenarios

- Facility may request inclusion of alternative scenario at any time
- Alternative operating scenario can be a different means of compliance with an existing standard or an entirely new applicable requirement
- Why wait to trigger and applicable requirement if you think one is coming?

Alternative Operating Scenarios

- Florida – Chapter 62-213.410(1)
- Georgia – 391-3-1-.03(10)(d)(1)(i)
- North Carolina – 15A NCAC 2Q.0508(p)
- Kentucky – 401 KAR Chapter 52:020, Section 10
- Colorado – 1001 AQC, Regulation 3
- Arkansas – Regulation 26,Chapter 7,Section 26.701(I)

Alternative Operating Scenarios

- Virginia – 9 VAC 80-110.J
- New Jersey – 7.27-22.16(h)
- New York – Chapter III, Subpart 201-6.5(f)(1)

Alternative Operating Scenarios

- Examples
  - HON-affected facility desires multiple compliance options stated to show compliance with MACT standard
  - Other examples

Alternative Operating Scenario

- Does your facility have a five-year plan?
- What affected units might be subject to additional air regulations or a change in regulations already in the permit?

Flexible Preconstruction Permits

- Couple flexible preconstruction permits with alternative operating scenarios to obtain the most flexibility and move toward the “ideal” title V permit

Streamlining Multiple Requirements

- Streamline multiple applicable requirements to which a process unit may be subject into ONE set of requirements
- Perform a streamlining analysis per EPA White Paper II

Streamlining

- Basis of Streamlining found here:
- http://www.epa.gov/ttn/oarpg/t5/memoranda/wtppr-2.pdf

Streamlining

- Once again, **REQUESTED BY THE FACILITY** not an automatic
- Imation Example